

FISHER | TAUBENFELD LLP

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC#: \_\_\_\_\_  
DATE FILED: 9/28/2021

225 Broadway, Suite 1700  
New York, New York 10007  
**Main** 212.571.0700  
**Fax** 212.505.2001  
www.fishertaubenfeld.com

Writer's direct dial: (212) 384-0258  
Writer's email: [michael@fishertaubenfeld.com](mailto:michael@fishertaubenfeld.com)

September 27, 2021

**VIA ECF**

Hon. Andrew L. Carter, Jr.  
United States District Judge  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

MEMO ENDORSED

Re: Lopez Catzin et al. v. Thank You & Good Luck Corp et al.  
Case No.: 15-cv-7109 (ALC)

Dear Judge Carter:

We represent Plaintiffs in this matter. We write to respectfully request an extension of two weeks of the deadlines to move to enter a judgment and for attorneys' fees and costs. This is the first request, and Defendants consent to this request. The current deadlines are:

- (1) Plaintiffs' motion to be filed by October 1, 2021;
- (2) Defendants' opposition to filed by November 1, 2021; and
- (3) Plaintiffs' reply to be filed by November 15, 2021.

The proposed revised schedule is as follows:

- (1) Plaintiffs' motion to be filed by October 15, 2021;
- (2) Defendants' opposition to filed by November 17, 2021; and
- (3) Plaintiffs' reply to be filed by December 1, 2021.

The reason for this request is that I had a family medical emergency over the last few weeks, particularly that my 73-year-old father was hospitalized with COVID. Fortunately, he has been discharged and is recovering. Coupled with the Jewish holidays this month, which have substantially reduced the number of days available this month to work, we need additional time to file the motions. We therefore respectfully request that extension requested above.

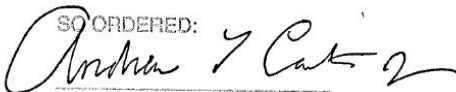
Thank you for your attention to the above.

Respectfully Submitted,

-----/s/-----

Michael Taubenfeld

The request for an extension of the briefing schedule is hereby **GRANTED**.

SO ORDERED:  
  
HON. ANDREW L. CARTER, JR.  
UNITED STATES DISTRICT JUDGE

**Dated:** 9/28/2021